

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Nicholas J. Cremona
Michael R. Matthias

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and for the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

JOSEPH S. POPKIN REVOCABLE TRUST
DATED FEBRUARY 9, 2006, a Florida trust,
ROBIN POPKIN LOGUE, as trustee of the Joseph S.
Popkin Revocable Trust Dated February 9, 2006,
SHARON POPKIN, DARA N. SIMONS (a.k.a.
DARA L. SIMONS) and MARK POPKIN,

Defendants.

Adv. Pro. No. 10-04712 (SMB)

STIPULATION FOR ENTRY OF JUDGMENT

IT IS HEREBY STIPULATED AND AGREED by and between plaintiff Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff (the “Trustee”) and defendants Robin Popkin Logue, as trustee of the Joseph S. Popkin Revocable Trust Dated February 9, 2006, and the Joseph S. Popkin Revocable Trust Dated February 9, 2006 (“Defendants”) (the Trustee and Defendants are collectively referred to as the “Parties”, and individually as a “Party”), as follows:

1. The Trustee shall be entitled to immediate entry of a Consent Judgment, a copy of which is attached hereto as Exhibit 1, entered against Defendants in the amount of \$625,449.00.
2. Defendants confirm the amount set forth in Paragraph 1 above.
3. That judgment shall be final for all purposes upon entry of judgment and each Party waives any right to appeal therefrom.
4. That pursuant to Rule 54(b) of the Federal Rules of Civil Procedure, there is no reason for delaying in entry of the Consent Judgment against Defendants in this multi-party adversary proceeding.
5. That Defendants, represented in this action by counsel, have read and understand the contents of this Stipulation for Entry of Judgment (this “Stipulation”).
6. That this Stipulation shall be filed immediately upon its execution.

7. This Stipulation may be signed in counterparts, all of which when taken together shall constitute the agreement of the Parties hereto. A photocopy, facsimile or email signature to this Stipulation shall be deemed as an original signature for any and all purposes.

Dated: November 30, 2016

Of Counsel:

BAKER & HOSTETLER LLP
11601 Wilshire Boulevard, Suite 1400
Los Angeles, California 90025
Attention: Michael Matthias
Email: mmatthias@bakerlaw.com
Telephone: 310.820.8800
Facsimile: 310.820.8859

BAKER & HOSTETLER LLP

By: s/ Nicholas J. Cremona
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and for the Estate of Bernard L. Madoff*

s/ Robin Popkin Logue

ROBIN POPKIN LOGUE, as trustee of the
Joseph S. Popkin Revocable Trust Dated
February 9, 2006

**JOSEPH S. POPKIN REVOCABLE TRUST
DATED FEBRUARY 9, 2006**

By: s/ Robin Popkin Logue

Robin Popkin Logue
Trustee

SEEGER WEISS LLP

By: s/ Parvin K. Aminolroaya
Water Street, 26th Floor
New York, New York 10005
Telephone: (212) 584-0700
Facsimile: (212) 584-0799
Stephen A. Weiss
Email: sweiss@seegerweiss.com
Christopher M. Van de Kieft
Email: cvandekieft@seegerweiss.com
Parvin K. Aminolroaya
Email: paminolroaya@seegerweiss.com

Attorneys for Defendants

EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	No. 08-01789 (SMB) SIPA LIQUIDATION (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. JOSEPH S. POPKIN REVOCABLE TRUST DATED FEBRUARY 9, 2006, a Florida trust, ROBIN POPKIN LOGUE, as trustee of the Joseph S. Popkin Revocable Trust Dated February 9, 2006, SHARON POPKIN, DARA N. SIMONS (a.k.a. DARA L. SIMONS) and MARK POPKIN, Defendants.	Adv. Pro. No. 10-04712 (SMB)

CONSENT JUDGMENT

WHEREAS, Irving H. Picard (the “Trustee”) is the trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act (“SIPA”), 15 U.S.C. § 78aaa *et seq.*, substantively consolidated with the liquidation under chapter 7 of the Bankruptcy Code 11 U.S.C. § 101 *et seq.* of the estate of Bernard L. Madoff (“Madoff”), currently pending in United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) as Case No. 08-01789 (SMB);

WHEREAS, the Trustee is duly qualified to serve and act on behalf of the estates of BLMIS and Madoff;

WHEREAS, ON OR ABOUT December 1, 2010, the Trustee commenced the above-captioned adversary proceeding in the Bankruptcy Court, alleging, *inter alia*, that defendants Robin Popkin Logue, as trustee of the Joseph S. Popkin Revocable Trust Dated February 9, 2006, and the Joseph S. Popkin Revocable Trust Dated February 9, 2006 (the “Defendants”), and others, received avoidable transfers in an amount aggregating Six Hundred Twenty-Five Thousand Four Hundred Forty-Nine United States Dollars (\$625,449.00) (the “Avoidable Transfers”) in connection with BLMIS Account No. 1ZA121 (the “Trustee’s Claims”);

WHEREAS, on or about November 30, 2016, the Trustee and Defendants entered into a Settlement Agreement and Release (the “Settlement Agreement”) in order to settle the Trustee’s Claims against Defendants upon the terms set forth therein;

WHEREAS, pursuant to the terms of the Settlement Agreement, on or about November 30, 2016, the Trustee and Defendants entered into a Stipulation for Entry of Judgment (“Stipulation”);

WHEREAS, pursuant to the terms of the Settlement Agreement and the Stipulation, Defendants have consented to the entry of judgment against them (the “Consent Judgment”) with respect to the Trustee’s Claims and the Avoidable Transfers; and

WHEREAS, the Trustee has agreed to forbear from enforcing and/or executing the Consent Judgment against Defendants, as set forth in the Settlement Agreement.

NOW, THEREFORE, IT IS HEREBY ORDERED AND ADJUDGED THAT:

1. The Avoidable Transfers are avoidable and avoided under section 548 of the Bankruptcy Code, SIPA and other applicable state law and are recoverable under sections 550 and/or 551 of the Bankruptcy Code, SIPA and applicable state law.
2. Subject to the terms of that certain Settlement Agreement and Stipulation, and as set forth in the recitals above, the Consent Judgment is hereby entered in favor of the Trustee and against Defendants in the amount of \$625,449.00 (the “Judgment Amount”).

3. This Consent Judgment is defined and limited as set forth herein and by the terms of the Settlement Agreement and Stipulation.

4. Pursuant to Rule 54(b) of the Federal Rules of Civil Procedure, there is no just reason for delaying in entry of this Consent Judgment against Defendants in this multi-party adversary proceeding.

5. The undersigned represent that the respective parties have obtained the advice of counsel and are consenting and agreeing to all of the terms of this Consent Judgment freely and voluntarily.

6. The Clerk of Court shall enter this Consent Judgment on the Docket.

Dated: November 30, 2016

**JOSEPH S. POPKIN REVOCABLE TRUST
DATED FEBRUARY 9, 2006**

By: s/ Robin Popkin Logue
Robin Popkin Logue
Trustee

s/ Robin Popkin Logue
Robin Popkin Logue, as Trustee of
the Joseph S. Popkin Revocable Trust
Dated February 9, 2006

Of Counsel:

BAKER & HOSTETLER LLP

BAKER & HOSTETLER LLP
11601 Wilshire Boulevard, Suite 1400
Los Angeles, California 90025-0509
Telephone: 310.820.8800
Facsimile: 310.820.8859
Michael R. Matthias
Email: mmatthias@bakerlaw.com

By: s/ Nicholas J. Cremona
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
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SEEGER WEISS LLP

By: s/ Parvin K. Aminolroaya
Water Street, 26th Floor
New York, New York 10005
Telephone: 212.584.0700
Facsimile: 212.584.0799
Stephen A. Weiss
Email: sweiss@seegerweiss.com
Christopher M. Van de Kieft
Email: cvandekieft@seegerweiss.com
Parvin K. Aminolroaya
Email: paminolroaya@seegerweiss.com

Attorneys for Defendants

SO ORDERED

Dated: _____, 2017
New York, New York

HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE